



Work Instruction (WI)

DIRECTIVE NO. 270-WI-4100.2.1B
EFFECTIVE DATE: 12/10/2015
EXPIRATION DATE: 12/10/2020

APPROVED BY Signature: Original Signed By
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COMPLIANCE IS MANDATORY

Responsible Office: Code 270, Information and Logistics Management Division

Title: Hazardous Materials Data Management

PREFACE

P.1 PURPOSE

This document describes the procedures and responsibilities of employees of the Information and Logistics Management Division (ILMD) in support of the Hazardous Materials Management System (HMMS) at the Goddard Space Flight Center. This support includes the following: research and cataloging of hazardous materials (HM); processing customer requests for HM; procurement of HM to fulfill customer requests; receipt, labeling, and data entry of HM into the HMMS system; labeling of HM products identified as “found on station”; providing inventory management and administrative support to GSFC customers; setting up new users and establishing new issue points; inventory report creation and generation as requested; and general customer services for all HMMS users.

P.2 APPLICABILITY

This work instruction is applicable to all ILMD, Goddard Logistics and Technical Information Contract (GLTIC), and Wallops Institutional Consolidated Contract (WICC) employees. GSFC will be used to describe requirements or processes applicable to both the Greenbelt and Wallops Flight Facility (WFF) locations of the GSFC. Requirements or processes that are applicable to only Greenbelt or WFF will be specified accordingly in this document.

P.3 REFERENCES

49 CFR [171](#) and [172](#) Transportation of Dangerous Goods
[GPR 1700.8](#), GSFC Hazardous Communications Program
[GPR 4100.2](#), Hazardous Material Data Management
[GPR 8500.3](#), Waste Management
[270-WI-5100.1.2](#), Procurement
[270-WI-4520.2.2](#), Central Receiving Operations

P.4 CANCELLATION

270-WI-4100.2.1A, Hazardous Materials Data Management

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P.5 TOOLS, EQUIPMENT, AND MATERIALS

- Personal computer with GSFC network connectivity
- HMMS label printer
- HMMS software and hardware
- Barcode scanner
- Personal Protective Equipment such as gloves, goggles, and smocks
- HM Containment pallets
- Hazardous and flammable materials cabinets
- Spill kit

P.6 SAFETY PRECAUTIONS AND WARNINGS

All ILMD, GLTIC and WICC employees handling hazardous materials shall exercise necessary precaution and follow the product specific safety guidelines provided on the Safety Data Sheet (SDS), also known as the Material Safety Data Sheet (MSDS). In addition, employees will use necessary Personal Protective Equipment (PPE), such as wearing gloves, goggles, and or smocks, as needed and required when handling hazardous materials. Additional guidance can be found in GPR 1700.8, GSFC Hazard Communication Program.

P.7 TRAINING

- All GLTIC and WICC employees shall complete Hazardous Communications training in accordance with GPR 1700.8. Contract employees who handle hazardous materials as part of their job responsibilities will receive additional hazardous materials training as required by their position descriptions.
- GLTIC employees responsible for shipping hazardous materials in commerce shall be trained and certified by the GLTIC Mechanical Engineer in accordance with 49 CFR Part [171](#) and [172](#) requirements – Transportation of Dangerous Goods.
- The HMMS software vendor provides individually tailored training on application capabilities and new functionality to HMMS staff annually. HMMS team members may attend the annual HM Conference and Training event upon approval of the Code 250 HMMS Program Manager.
- HMMS users and Issue Point managers will be trained by the HM Material Application Specialist on use of HMMS to include generating yellow labels for HM products within their local inventories, turning in labels for empty containers, and obtaining Safety Data Sheets within the application. Code 250 Hazardous Waste personnel are responsible for training related to the waste functions within HMMS.

P.8 RECORDS

Record Title	Record Custodian	Retention
Requests for extension of the Data Validation Date for HMMS labeled products	HM Material Application Specialist	NRRS 8/23.5A3a – Destroy 3 years after superseded or no longer needed, whichever is sooner
Record of HM Training	GLTIC and WICC Human Resources Head	*NRRS 3/33C – Destroy or delete 5 years after separation of employee or when no longer needed, whichever comes first.

* NRRS – NASA Records Retention Schedule (NRRS 1441.1)

P.9 MEASUREMENT/VERIFICATION

The GLTIC contract contains performance requirements for the timeliness of processing incoming hazardous materials from the incoming receiving and inspection process to the completion of the HM labeling. All incoming HM, regardless of how the materials were purchased, shall be received, inspected, labeled, and prepared for delivery within 48 hours of initial receipt to the Greenbelt Receiving loading dock. Results will be captured and reported to the 273 Supply Team Lead as part of the contractor performance standard process.

PROCEDURES

In this document, a requirement is identified by “shall,” a good practice by “should,” permission by “may” or “can,” expectation by “will,” and descriptive material by “is.”

1.0 Introduction and Overview

The ILMD and its GLTIC and WICC contractors maintain data and processes transactions in the Hazardous Materials Management System (HMMS) application in support of the Code 250 Medical and Environmental Management Division and GPR 4100.2, Hazardous Materials Management. Code 270 is responsible for the receipt, storage, labeling, distribution, transportation, data entry, and inventory report generation of HM products.

1.1 Responsibilities

1.1.1 Supply Team Lead

- Responsible for the overall management of the Code 270 elements of the HMMS program.
- Ensures that procedures and requirements set forth in this work instruction are followed.
- Works with Code 250 personnel on the overall management of the HMMS program.

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DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

1.1.2 GLTIC Supply Branch Manager

- Oversees the operations and employees who support the materials management portion of HMMS.
- Ensures HMMS personnel receive the necessary training to perform their duties.
- Works with Code 250 personnel, the Transportation Branch Manager, and the IT Support Manager to support the overall Greenbelt hazardous materials program, and specifically the HMMS program.

1.1.3 HM Material Application Specialist (Greenbelt)

- Maintains inventory data within the HMMS application.
- Generates routine and custom HM inventory reports as needed, to include the Data Validation report.
- Acts as the principal customer service provider for all matters pertaining to HM procurement, inventory and data management. Provides user training as needed.
- Serves as the subject matter expert for the inventory portion of HMMS, to include the testing of changes and upgrades to the materials management portion of the application.
- Investigates HMMS application problems for users and reports all system issues to the Code 250 HMMS Lead and IHS Support.
- Provide training to other Issue Point coordinators and general users, as needed.
- Ensures that newly cataloged HM is reported to Code 250 Environmental Management and Code 360 Chemical Hygiene Officer on a daily basis.
- Serves as the overall Lead for the materials management personnel and operations portion of HMMS and serves as the interface between HM Super Users and IHS Support.
- Performs functional testing for software patches, upgrades and new releases.
- Performs the responsibilities of the HM Material Control Clerk, as needed.
- Establishes new users and passwords to the HMMS application and assigns user responsibilities and roles.
- Supports and complies with internal and external audits.

1.1.4 HM Material Control Clerk (Greenbelt and WFF)

- Catalogs new HM requested and received in both the HMMS system and the Advanced Materials Management System (AMMS), as needed.
- Labels all HM coming to GSFC through the Receiving loading dock and items reported as Found-on-Station.
- Acts as the customer liaison between HM requestors and GLTIC procurement personnel.
- Assists end users and employees at their locations with the identification and labeling of their HM products.
- Assists with the physical inventory of HM products, as needed.
- Updates the HMMS application for all material issues, transfers, relocations, and turn-ins to maintain inventory accuracy.

1.1.5 GLTIC Acquisition Specialists

- Procure HM upon receipt of a valid procurement requisition in accordance with 270-WI-5100.1.2, Procurement.
- Obtain valid SDS for all GLTIC procured HM as required.

1.1.6 Receiving Personnel

- Receive, inspect, and process incoming hazardous materials in accordance with 270-WI-4520.2.2, Central Receiving Operations.
- Turn over all HM materials received at the Receiving loading dock to HMMS personnel to be tagged and processed as needed.

1.1.7 Transportation Personnel

- Deliver HM materials to end users daily and obtain user acceptance/signature for the materials delivered. Responsible for proper handling and delivery of HM materials in accordance with SDS requirements.
- Pick-up and return empty HM containers to the HMMS area upon request from a Greenbelt employee.

2.0 Overview

The Hazardous Materials Management System (HMMS) is designed to provide control and tracking of all HM at GSFC from the time that the products arrive on Center through product use and/or disposal. The HMMS system is the primary tool used to support this effort, where Code 270 personnel are responsible for the initiation of the inventory record for HM products and Code 250 personnel are responsible for the hazardous waste and disposal portions of the program as well as the overall hazardous materials program for GSFC. Details about the HMMS can be found on the HMMS website <http://hmms.gsfc.nasa.gov> for Greenbelt users and at <http://internal.wff.nasa.gov/code250/HMMS.php> for Wallops users. Customers are encouraged to contact both 270 and 250 personnel using the GSFC-HMMS-Support@nasa.gov email account for support at Greenbelt and WFF-DL-HMMS@mail.nasa.gov for support at Wallops.

3.0 HM Ordering and Acquisition

GSFC employees have the option of procuring HM from a variety of sources including AMMS, Government Procurement/Code 210, support contractor procurements, etc. Regardless of how the HM is procured, all HM delivered to GSFC for use at GSFC shall be labeled and managed in accordance with the procedures in GPR 4100.2 and this work instruction. This section will describe the customer ordering and acquisition processes when the procurements are performed by GLTIC personnel using the AMMS system.

DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

3.1 Receipt and Processing of Customer Requests

Customers may order HM through AMMS by entering their order directly into the system using their AMMS user id and password or by contacting the HMMS staff with their order information. Regardless of how the material is ordered, every customer who requests material through AMMS must be authorized to spend funds from the WBS that will pay for the products requested. GLTIC and WICC employees shall confirm that customers are authorized to spend funds from the WBS provided before entering any orders into AMMS. Customers who do not have the proper authorization to spend funds in AMMS will be provided instructions on how to obtain authorization. Additional assistance will be provided by the GLTIC AMMS Functional Analyst, as needed.

3.1.1 All HM items in AMMS and HMMS shall be assigned a National Stock Number (NSN) or Local Stock Number (LSN) in accordance with Government and NASA cataloging requirements. All stock numbers shall be assigned the proper Quality Assurance Requirement (QAR) code to identify the material as being hazardous as well as any shelf-life characteristics the material may have. All HM items will be cataloged using the NSN, if one exists, otherwise a Local Stock Number (LSN) will be assigned and cataloged for the material.

3.1.2 The HM Material Control Clerk will oversee all customer requests for HM products through AMMS and coordinate these requests with GLTIC procurement personnel. Any special requirements related to the customer order, such as urgency of the order, Certificates of Conformance or Certificates of Analysis, special packaging requirements, and requirements for a Receiving Inspection and Test Form, GSFC 20-2, shall be communicated to GLTIC Procurement personnel at the time the order is entered.

3.1.3 Whenever possible, the HM Material Control Clerk will review existing inventory of HM products to determine if the product is available at GSFC to fulfill another customer's request for that product. When it is determined that existing inventory can be used versus procuring new materials, the HM Material Control Clerk shall process the necessary transactions in HMMS to transfer the inventory from one location and user to another.

3.2 Procurement of Hazardous Materials

All HM procurements made by GLTIC personnel will be processed in accordance with the procedures described in 270-WI-5100.1.2. GLTIC Acquisition Specialists shall request that vendors provide a SDS with all HM purchases as well as any other material documentation requested by the end user. Acquisition Specialists will work directly with HMMS personnel on all HM procurement related matters including estimated delivery dates, product discrepancies, vendor returns, etc. Blanket Purchase Agreements (BPAs) may be established for the procurement of frequently used products and shall be processed and managed in accordance with 270-WI-5100.1.2.

As directed by the Occupational Safety and Health Division, Code 360, GLTIC procurements of hazardous materials do not require that the customer provide a completed GSFC 23-59, Initiator's Acquisition Checklist prior to procurement of hazardous materials. Code 360 does require notification

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DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

upon the receipt of a new HM at Greenbelt, and Code 803 is notified upon receipt of new HM at Wallops. Section 3.3.6 describes that notification process.

3.3 Receipt and Issue of Hazardous Materials in HMMS

All HM products delivered to GSFC shall be received and issued in HMMS by HMMS personnel in order to establish the inventory record and delivery location of the product. The procedures for processing HM products into inventory vary depending on how the product arrived. This section describes each of these processes.

3.3.1 Materials Delivered to Receiving

- a. All HM products arriving at Receiving shall be logged in on the HMMS Receiving Counts spreadsheet by Receiving personnel and placed on the HM containment pallet for processing. All GLTIC and WICC personnel shall ensure the appropriate personnel protective equipment is worn when processing HM. HM products procured in AMMS or the Code 210 procurement system, SAP, shall be inspected and received in those systems in accordance with the procedures outlined in 270-WI-4520.2.2 by Receiving personnel. When Receiving personnel have completed the receipt and inspection of AMMS and SAP procured HM's, they shall notify the HM Material Control Clerk.
- b. The HM Material Clerk shall open the product packaging and review the incoming documentation for each product received, regardless of how the material was purchased. The HM Material Clerk shall ensure that a proper SDS was received with the product. If a SDS was not received, the HM Material Clerk will make every effort to obtain a SDS for the product to include contacting the supplier and searching the internet before the HM is released to the end user.
- c. The HM Material Clerk will search HMMS to determine if a stock number exists for the product received. If a stock number does not exist, the HM Material Clerk shall catalog a stock number in HMMS for the product received in accordance with 270 work instructions. The SDS will be scanned and attached to the item record in HMMS.
- d. The HM Material Clerk will create an inventory record for the material received using the unique stock number and issue the product to the end user within HMMS. A HMMS barcode label will be produced and attached to each HM container received. The HM containers will be repackaged and placed on the outbound containment pallet for delivery to the end user by Transportation personnel.
- e. If an SDS cannot be located for the product received, the HM Material Clerk will contact the GLTIC Acquisition Specialist, if product was purchased through AMMS, or the end user if purchased through another method to let them know that the product cannot be received without additional paperwork. Upon receipt of the necessary documentation, the above steps shall be performed.
- f. On rare occasions, HM materials arriving at Receiving are urgently needed by the end user and as such are delivered to the end user before the product is labeled by the HM Material Clerk. When this occurs, Receiving shall provide the HM Material Clerk with a copy of all associated paperwork for that shipment. The HM Material Clerk will process the product into the HMMS inventory at outlined above, generate the HMMS labels, and physically go to the end user's location to apply the labels to the product after delivery of the product is completed.
- g. If the HM Material Clerk is unable to generate a HMMS label for any reason, for example a missing SDS, the Clerk will work with the end user and the Acquisition Specialist, if the product was

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DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

purchased through AMMS, to obtain the data or items necessary to catalog and label the product. If all attempts to label the product have failed, the HM Material Clerk shall notify the GLTIC Supply Manager and the Code 250 HMMS Project Manager for resolution.

- h. All HM items that remain in Bldg. 35 at Greenbelt or Bldg. F-19 at WFF overnight or for an extended period of time shall be secured in accordance with the product SDS recommendations. All HM products placed in a HM or flammable material cabinet shall have the associated SDS placed on the outside of that cabinet for easy identification. The Receiving Warehouse Supervisor shall ensure that all HM items are secured at the end of each workday.

3.3.2 Cylinder and Dewar Deliveries

- a. Many compressed gas cylinders and dewars arriving at GSFC are delivered to locations other than Receiving. When this occurs at Greenbelt, the GLTIC Cryogenics Material Coordinator will inform the HM Material Clerk of the products received and provide all necessary documentation for those products. At WFF, the HM Material Clerk will be notified by the receiving organization and provided all necessary documentation.
- b. The HM Material Clerk will receive and issue the compressed gas cylinders and dewars into HMMS, generate HMMS labels, and coordinate the labeling of these cylinders and dewars by the appropriate contractor personnel.
- c. Compressed gas cylinders and dewars delivered to Receiving are processed in accordance with Section 3.3.1.

3.3.3 Materials Direct Delivered to Satellite Issue Points

Code 250 may approve the establishment of a Satellite Issue Point (SIP) for the HMMS system. A SIP allows GSFC organizations to generate their own HMMS labels for products under their control. Currently there is one approved SIP at Greenbelt in support of Code 220. Hazardous materials purchased by this contractor are not processed by Receiving personnel, but rather HM products are delivered directly to the contractor on-site who is responsible for labeling their own HM items.

Satellite Issue Point coordinators process incoming HM to the HMMS system as described in Section 3.3.1 with one exception, SIP coordinators do not catalog new items into HMMS. When a SIP coordinator has a new item to be cataloged in HMMS, they shall forward a copy of the SDS to the HM Material Clerk. The HM Material Clerk will create a stock number in HMMS for the new product and notify the SIP coordinator when completed. The SIP coordinator will then proceed to create the inventory record, issue the product in HMMS, and print and apply the HMMS label to the material.

3.3.4 Found On Station or On-Call Labeling

When HM is found on Center without a HMMS barcode label, the user shall contact the HMMS office in accordance with GPR 4100.2. HMMS personnel will gather the necessary information and documentation from the user to create the inventory record in HMMS. Once the inventory record is created and HMMS barcode labels generated, HMMS personnel will physically go to the user's location to apply the barcode labels to the products.

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DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

3.3.5 Transfer of HM from One User/Location to Another

End users occasionally transfer HM from their inventory to another user who needs that product or move product from one location to another within the same organization. When this occurs, the user shall notify the HMMS office of this transfer. HMMS personnel shall update HMMS inventory records accordingly to show the transfer of material from one owner and/or location to another.

3.3.6 Reporting HM Products Received to Code 360 (Greenbelt) and Code 803 (Wallops)

HMMS is required to generate a daily report of all new HM products arriving at GSFC for the first time. This includes the receipt of products previously used on Center but for which a new SDS sheet has been issued for the product. This data is collected when a yellow HMMS label is generated upon physical receipt of the HM product. The HM Material Application Specialist shall ensure that this report is generated and emailed to the Code 360 Occupational Safety and Health Office daily for Greenbelt material. At WFF, the HM Material Clerk shall ensure this report is generated and emailed to the Code 803 Safety Office daily.

3.4 Delivery of HM

All HM products processed and labeled in Receiving shall be delivered to the end user by GLTIC and WICC Transportation personnel. Transportation personnel shall deliver products to the customer location identified on the documentation, obtain a customer signature for the products delivered, and return the customer signed documentation to Receiving for filing. Any HM materials that cannot be successfully delivered for any reason, shall be returned to the Receiving area at the end of each workday and secured as described in Section 3.3.1.

Although it is not a requirement, it is a goal of the GLTIC and WICC to receive, label, and deliver all HM products on the same day that they arrived to limit the amount of items that must be kept in the Receiving area overnight.

3.5 Management of HMMS Labels

When customers have finished using their HM products, they are required to dispose of them in accordance with GPR 8500.3, Waste Management and to turn the yellow HMMS labels in accordance with GPR 4100.2, Hazardous Material Data Management. Turn in of the yellow HMMS labels is required so that HMMS inventory records can be updated to reflect product usage.

3.5.1 Empty HM Container Pickup

At Greenbelt, customers may request that their empty HM containers be picked up and returned to the HM Office by submitting an Empty HM Container pickup request in the eMOD system. When this occurs, Transportation personnel will pick up the empty containers from the end users location and return them to the HM area in Receiving.

DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

Transportation personnel shall only pick up containers that are empty. Transportation personnel shall not pick up containers that have visible product remaining in them, containers that appear to have product on the outside of the container, and aerosol cans. Customers will be directed to contact the Hazardous Waste Office for the pick-up and removal of these types of items. When Transportation personnel are unsure if they should pick up the HM container or not, they shall leave the container where it is and direct the customer to contact Haz Waste.

Upon receipt of an empty HM container, HMMS personnel shall update the HMMS inventory data to reflect that the product associated with the yellow label has been used on Center. The container will then be discarded in the trash.

At WFF, customers are required to turn in their yellow HMMS labels for all containers that are empty. Labels are returned to the HM Material Control Clerk who is responsible for updating the HMMS inventory to reflect usage of the product. Once the HMMS labels has been turned in, the customer is then responsible to dispose of the empty container themselves.

3.5.2 HMMS Label Turn-in

Customers may dispose of some HM containers themselves in accordance with GPR 8500.3. When this occurs, customers are required to remove the yellow HMMS label from the container and return it to the HMMS office. Upon receipt of yellow HMMS labels, the HM Material Application Specialist or the HM Material Control Clerk shall update HMMS to reflect that the HM associated with the label has been used on Center. The yellow HMMS label will then be discarded.

3.5.3 Hazardous Waste

Code 250 is responsible for the pickup and processing of all hazardous waste materials and aerosol cans. Upon pickup of either hazardous waste materials or aerosol cans that contain a yellow HMMS label, Code 250 personnel will update HMMS inventory data to reflect the final usage and disposition of the products in accordance with their established procedures.

3.6 Customer Support

GLTIC personnel shall provide general customer support to employees for the inventory module of HMMS.

3.6.1 The HM Material Application Specialist shall establish and maintain user accounts as needed. HMMS allows customers access to SDS and inventory information without requiring a user id and password to the application so user accounts are not necessary for most employees outside of Codes 250 and 270.

3.6.2 The HM Material Application Specialist will generate standard and one-of-a-kind reports of inventory data from HMMS as requested. Requests for data that are outside of the scope of a general application query shall be referred to Code 250 for disposition.

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DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

Page 11 of 14

3.6.3 HMMS personnel at Greenbelt and WFF will assist customers as needed and when available with the physical inventory and identification of HM products at the customers location. HMMS personnel will work with the customer to get all of their HM products cataloged and labeled in accordance with Center requirements.

4.0 Hazardous Material Spill Procedures

In the event that HM is found to be leaking or spills while in the possession of ILMD, GLTIC or WICC personnel, immediate action will be taken to ensure the safety of people and property. If materials are located in the Receiving area when the spill or leak is observed, the procedures below will be followed. In addition, all employees shall follow the procedures located in the appropriate Building Emergency Plan (BEP) and the Storm Water Pollution Prevention (SWPP) program.

- a. If the leaking or spilled HM product is not toxic, personnel will use the spill kit products available in the Receiving area to contain the spill and create a perimeter around the contaminated area. Personnel shall dial 911 to report the HM spill or leak and then direct other employees to stay away from the contaminated area until Security personnel arrive.
- b. If the leaking or spilled HM product is toxic or if the type of HM is unknown, the employee who identified the spill will immediately alert all personnel to evacuate the area and call 911.
- c. All employees will remain in the designated assembly area as identified in the BEP and notify the primary or alternate building FOM of the incident. When possible, HMMS or Receiving personnel will provide a copy of the SDS for the HM to the FOM and/or First Responders to assist with incident management. Personnel from the spill area must report all known HM within that area to the FOM and First Responders.

Appendix A – Definitions

A.1 Empty Container - A container or liner from which all wastes have been removed using the practices commonly employed to remove material from that type of container, and

- No more than 1 inch of residue remains on the bottom for containers of 110 gallons or less, or
- No more than 3% by weight of the capacity remains for containers of 100 gallons or less, or
- No more than .3% by weight of the capacity remains for containers greater than 110 gallons.

A.2 Hazardous Material (HM) - Toxic, flammable, reactive, or corrosive substances, and substances identified by Federal and state regulations as posing a risk to health, safety, or property.

A.3 Hazardous Material Management System – The software, hardware, procedures, and personnel used for inventory and control of hazardous materials at GSFC.

A.4 Safety Data Sheet (SDS) – A document designed to provide workers and emergency personnel with proper procedures for storing and handling various chemicals. The SDS provides information in nine areas: identification, hazardous ingredients and components, physical and chemical characteristics, fire and explosion hazards, reactivity data, health hazard data, spill or leak procedures, special protection, and special precautions. Formerly referred to as a Material Safety Data Sheet (MSDS).

DIRECTIVE NO.	<u>270-WI-4100.2.1B</u>
EFFECTIVE DATE:	<u>12/10/2015</u>
EXPIRATION DATE:	<u>12/10/2020</u>

Page 13 of 14

Appendix B – Acronyms

AMMS	Advanced Material Management System
BEP	Building Emergency Plan
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
eMOD	Electronic Management Operations Directorate system
GLTIC	Goddard Logistics and Technical Information Contract
GSFC	Goddard Space Flight Center
HM	Hazardous Material
HMMS	Hazardous Material Management System
ILMD	Information and Logistics Management Division
LSN	Local Stock Number
MSDS	Material Safety Data Sheet
NSN	National Stock Number
SIP	Satellite Issue Point
SDS	Safety Data Sheet
SWPP	Storm Water Pollution Prevention

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DIRECTIVE NO. 270-WI-4100.2.1B
EFFECTIVE DATE: 12/10/2015
EXPIRATION DATE: 12/10/2020

Page 14 of 14

CHANGE HISTORY LOG

Revision	Effective Date	Description of Changes
Baseline	09/17/2013	Initial Release
A	01/27/2014	<ul style="list-style-type: none">Deleted section 3.1.3 requiring the use of a GSFC 23-59 for GLTIC purchases of HMAdded second paragraph to section 3.2Minor edits to wording in section 3.3.3
B	12/10/2015	<ul style="list-style-type: none">Modified language so that the WI is applicable to operations at WFFDeleted reference to 29 CFR for HazComm training. That requirement now outlined in GPR 1700.8, so training reference updated to the GPR.Deleted all references to providing HMMS database support as that work is no longer performed by ILMD personnel to include deletion of Section 1.1.3, 1.1.4, and 1.1.10Replaced WOA reference in Section 3.1.2Section 5.0 deleted as this is no longer an ILMD responsibility

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